

iGT UNC / iGT INC Consultation Response

Date																	
Reference	iGT049 Modification Proposal Consultation																
Title	Tolerance for SSP Sites																
Respondee	Cher Harris SSEPL																
Position on the Modification	Qualified support for Modification (delete as required)																
<p>Facilitation of the relevant objectives <i>How this proposal will, if implemented, better facilitate the “code relevant objectives”, as defined in Standard Condition 9 of the Gas Transporters Licence. For those answered Yes to, please provide a detailed explanation below the table.</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 80%;">Relevant Objective</th> <th style="width: 20%;">Yes/No</th> </tr> </thead> <tbody> <tr> <td>a. the efficient and economic operation of the pipe-line system to which this licence relates</td> <td style="text-align: center;">Y</td> </tr> <tr> <td>b. so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters</td> <td style="text-align: center;">Y</td> </tr> <tr> <td>c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence</td> <td></td> </tr> <tr> <td>d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers</td> <td></td> </tr> <tr> <td>e. so far as is consistent with sub-paragraphs (a) to (d), the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers</td> <td></td> </tr> <tr> <td>f. so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code referred to in paragraphs 2 and 5 respectively of this condition</td> <td></td> </tr> <tr> <td>g. so far as is consistent with sub-paragraphs (a) to (f), the compliance with the Regulation* and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators</td> <td></td> </tr> </tbody> </table> <p style="margin-left: 40px;">* Regulation 2009/715/EC of the European Parliament and of the Council of 13 July 2009</p> <p><i>Relevant Objectives to be better facilitated:</i></p>		Relevant Objective	Yes/No	a. the efficient and economic operation of the pipe-line system to which this licence relates	Y	b. so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters	Y	c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence		d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers		e. so far as is consistent with sub-paragraphs (a) to (d), the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers		f. so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code referred to in paragraphs 2 and 5 respectively of this condition		g. so far as is consistent with sub-paragraphs (a) to (f), the compliance with the Regulation* and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators	
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<p>Likely impact on environment? None</p>																	

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Implementation issues including impact on your systems

Additional Information and Comments

The business case for this change has not been clearly stated in terms of the volume of sites likely to be impacted. Also, it is likely to be a short-lived change, until such time as Rolling AQ is implemented.

Whilst we are happy with the principle of allowing more AQs to be challenged, we are concerned about the extra work required if the volume of challenges significantly increases. We would therefore need to consider further automation of our AQ Review processing in order to cope with the additional Shipper challenges. As such, we would require a minimum of 9months implementation from Authority approval.

Completed forms should be returned to the iGT UNC Representative, Gemserv Ltd at iGT-UNC@gemserv.com or faxed to 020 7090 1001